

1 which this Court holds the Initial Case Management Conference from December 22, 2011, to
2 March 1, 2012, for the following reasons.

3 1. On December 12, 2011, Plaintiff Isaac Lewis filed a First Amended Complaint
4 ("FAC") which, among other things, deletes causes of action that were the subject of the Motion
5 to Dismiss, thereby making moot the Motion to Dismiss.

6 2. The FAC adds a defendant, Local Union 250, which has not yet been served.

7 3. The FAC adds new claims and allegations which Defendant Kaiser Foundation
8 Hospitals has not yet had an opportunity to evaluate.

9 4. Plaintiff's attorney, Angela Morgan, has two major surgeries on December 20,
10 2011, and will be unavailable until mid-February while she recovers.

11 No previous time modifications have been made in this case.

12 The requested time modification will have no effect on any other dates in this case.

13 For these reasons, to which the parties attest in the accompanying declaration, and on this
14 record, Defendant Kaiser Foundation Hospitals and Plaintiff Isaac Lewis, through their counsel of
15 record, stipulate to request the following Order of this Court:

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1 A. That Defendant's Motion to Dismiss the Complaint, scheduled for hearing on
2 December 22, 2011, be declared moot and removed from the calendar.

3 B. That the Initial Case Management Conference set for December 22, 2011, at 8:30 a.m.,
4 be postponed until March 1, 2012, at 8:30 a.m.

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6 DATED: December 13, 2011

MORGAN & ASSOCIATES

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8 By: /s/ Angela L. Morgan

Angela L. Morgan

9 Attorney for Plaintiff ISAAC LEWIS

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12 DATED: December 13, 2011

DAVIS WRIGHT TREMAINE LLP

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14 By: /s/ Candice S. Petty

Judith Droz Keyes

Candice S. Petty

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16 Attorneys for Defendant KAISER FOUNDATION
17 HOSPITALS, previously erroneously sued as The
18 Permanente Medical Group

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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21 DATED: December 19, 2011.



22 WILLIAM ALSUP

23 UNITED STATES DISTRICT JUDGE
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